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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 **-oOo-**

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12)
13 MANDIE L. ABELS,)
14 Defendant.)

2:12-cr-0058-PMP

MOTION FOR JOINDER OF
PLAINTIFFS MOTION

FOR REDUCTION OF DEFENDANT'S
SENTENCE AND SUPPLEMENT THERETO

15 COMES NOW, Chad A. Bowers, Esq, counsel of record for Defendant Mandie
16 Abels, in the above entitled matter and hereby respectfully requests that this Court grant
17 Plaintiff's Motion for Reduction of Defendant Mandie Abels' Sentence under Federal Rule
18 of Criminal Procedure 35 (Docket #24) and requests that Ms. Abel's sentence be reduced
19 by 5 years to ten years (120 Months) in prison as recommended by the Government in the
20 supplement thereto (Docket #27).

21 Dated this 14th day of December, 2014.

22 /S_____
23 Chad A. Bowers, Esq.
24 Attorney for Defendant
25
26

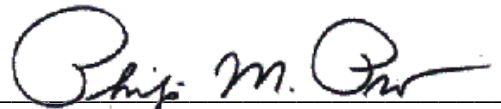
MEMORANDUM IN SUPPORT OF MOTION FOR JOINDER

Defendant Abels in complete agreement with the Government's position as stated in the pleadings relating to the Government's motion. Defendant will file a sentencing memorandum under separate cover further detailing the various reasons why a five year reduction in Ms. Abels sentence is fair and appropriate. For purposes of this motion for Joinder Defendant believes that the Government's motion accurately and sufficiently lays out the legal and factual basis for a reduction in Ms. Abels' sentence. Under separate cover Ms. Abels will address various aspects of her conduct prior and subsequent to the offense as well as provide letters of support and other materials supporting the appropriateness of a 120 month sentence.

Dated this 14th day of December, 2014.

_____/s_____
Chad A. Bowers, Esq.
Attorney for Defendant Abels

IT IS SO ORDERED:



PHILIP M. PRO, U.S. District Judge

Dated: December 15, 2014

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion for Joinder was electronically filed in compliance with local rule to provide a true and accurate electronic copy to all interested parties in this action.

Dated this 14th day of December, 2014.

_____/s_____
Chad A. Bowers, Esq.